

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Jiangsu Huari Webbing
Leather Co., Ltd.

Plaintiff

v.

Joes Identified in
Schedule "A"

Defendants.

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Case No. 23-cv-2605

DECLARATION OF JIYUAN ZHANG

I, Jiyuan Zhang, hereby declare as follows:

1. I am an attorney with the law firm of J. Zhang & Associates, P.C. located at 136-20 38th Avenue, Ste 11G, Flushing, NY 11354 and represents Jiangsu Huari Webbing Leather Co., Ltd in the above-referenced action. I make and submit this declaration in connection with Plaintiff's Opposition to Defendant, Hyponix's Motion for Attorney Fees, Bond Damages and Sanction.

2. **Exhibit A:** Results of a search conducted through Lexis CourtLink, narrowing down to "defendant-litigate" with the keyword "schedule A" and focusing on intellectual property cases. The search spanned from January 1, 2019, to December 31, 2023, resulting in a total of 2,870 cases.

3. **Exhibit B:** Results of a search conducted through Lexis CourtLink, specifically narrowed down to "defendant-litigate" using the keywords "schedule A" and "intellectual property" within the timeframe of January 1, 2019, to December 31, 2023, with a focus on cases in the state of New York. The search yielded a total of 45 cases.

4. **Exhibit C:** A true and correct copy of the U.S. Patent 11,468,673, also known as the "'673 Patent."

5. **Exhibit D:** A true and correct copy of the Hyponix's Amazon frontstore.

6. **Exhibit E:** A true and correct copy of the documentation pertaining to Hyponix's registration from the state of Delaware (Delaware.gov). This exhibit reveals that there is only one company registered in Delaware under the name of Hyponix, namely Hyponix Brands, LLC.

7. **Exhibit F:** A true and correct copy of Hyponix Sporting Goods webpage. This exhibit reveals that there is no address information or full legal business name provided throughout the webpage.

8. **Exhibit G:** A true and correct copy of the registration information for Hyponix obtained from the Canadian government website. This exhibit reveals that the registered company is Byponix Brands Ltd, with a registered address at 9317 188 Street, Surrey BC V4N 3V1, Canada.

9. **Exhibit H:** A true and correct copy of Defendant Hyponix's Amazon store, indicating that the Defendant was selling the same product under multiple listings.

10. **Exhibit I:** An article titled "When Is The Best Time To Buy Home Exercise Equipment?" published on the website <https://the-home-gym.com/>. This article listed several months

11. **Exhibit J:** An article titled "When Is the Best Time to Buy Outdoor Gear?" published on nytimes.com.

I declare that the foregoing is true.

Dated: May 15, 2023

Queens, New York

/s/ Jiyuan Zhang

Jiyuan Zhang